

BERLINE

ADVERTISING, MARKETING AND DIGITAL COMMUNICATIONS

October 7, 2014

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: MB Docket No. 14-57

Dear Chairman Wheeler and Commissioners:

I am the chairman and owner of BERLINE, a full-service Advertising, Marketing and Digital Communications Agency. We are based in Royal Oak, Michigan and serve clients locally, regionally and nationally. Our client base is diversified and includes organizations in the food, healthcare, automotive, financial services, corporate, retail and not-for-profit categories. Our billings are over \$65 million annually.

BERLINE does business with Comcast through buying local cable spots on behalf of our clients. We are supportive of the proposed transaction between Comcast and Time Warner Cable for several reasons, including the efficiencies that the combined company will deliver for spot cable buying. Today, we work with many spot cable partners to execute media buys on behalf of our clients. The complementary footprints of Comcast and Time Warner cable, when combined as one, will deliver a more seamless buying process, and will enable the combined company to collect and analyze even more data about visibility and engagement that will make our spot buys for clients more efficient and effective.

In addition to improving the ad buying and placement process, we are supportive of the proposed transaction due to the innovation in advertising technology that the scaled company can deliver. Even with the targeting capabilities of spot cable buying, some ad placements are still largely irrelevant to consumers who receive them. Addressable advertising will enable the deployment of advertising buys that have been placed on broad demographic characteristics in addition to geographic segmentation. These enhanced targeting capabilities will further improve the efficiency and effectiveness of our local cable spot buying. While Comcast has deployed addressable advertising in some markets, through the combined company, it will be able to deliver these strategic capabilities on a much greater scale over its larger footprint post-transaction. This will expand the pool of desired viewers and also allow for targeted buying at scale. All of these developments will be good for the local advertising market, my clients, and consumers.

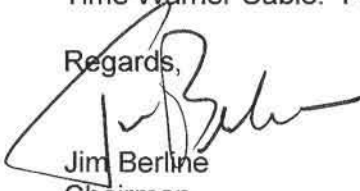
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A D V E R T I S I N G , P R A N D M A R K E T I N G C O M M U N I C A T I O N S

And these benefits will occur without any adverse effect on competition. I know from first-hand experience that Comcast and Time Warner Cable have discrete geographic footprints, and thus they do not currently compete for local advertisers. If anything, with the deployment of new advertising technologies at scale to benefit local advertisers, BERLINE expects there may be enhanced competition in the marketplace over the next few years, which again will ultimately benefit our advertising clients, consumers, and our agency.

For these reasons, BERLINE fully supports the proposed transaction between Comcast and Time Warner Cable. Please contact me with any questions.

Regards,

A handwritten signature in black ink, appearing to read 'Jim Berline', is written over the word 'Regards,'.

Jim Berline
Chairman
BERLINE
423 N. Main St. Suite 300
Royal Oak, MI 48067